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September 29, 2020

VIA ECF

The Honorable Douglas A. Arpert
Clarkson S. Fisher Federal Building & United States Courthouse
402 East State Street, Room 6000
Trenton, New Jersey 08608

Re: *Martinez v. City of Asbury Park, et al.*, No. 3:20-cv-8710 (D.N.J.)

Dear Judge Arpert:

On behalf of Plaintiff Gustavo Martínez, we respectfully write regarding the schedule for Defendants' responses to Plaintiff's First Amended Complaint. *See* Dkt. 16. With the consent of all Defendants City of Asbury Park, County of Monmouth, Amir Bercovicz, Dewitt Bacon, Daniel Savastano, and William Whitley (collectively herein, "Defendants"), we request that the Court enter the following consolidated schedule with respect to the responses of Defendants:

- **October 19, 2020:** Defendants shall serve responses, including any Rule 12 motions, to the First Amended Complaint.
- **November 16, 2020:** Plaintiff shall serve responses to any Rule 12 motions that Defendants may file.
- **November 30, 2020:** Defendants may file replies in further support of any Rule 12 motions.
- **December 6, 2020:** Any Rule 12 motions shall be returnable.

Additionally, Plaintiff is aware that the Court has scheduled an initial conference on October 22, 2020, *see* Dkt. 21, and believes that the conference should proceed notwithstanding any potential Rule 12 motions. As always, we thank the Court for its consideration.

Respectfully submitted,

/s/ Stephanie L. Silvano

Stephanie L. Silvano

CC: All Counsel of Record (via ECF)